REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicants thank the Examiner for accepting the drawings filed on July 16, 2003, for initialing the Information Disclosure Statements filed on July 22, 2004 and July 22, 2005, and for carefully considering this application.

Disposition of Claims

Claims 1-30 are pending in this application. Claims 1, 11, and 21 are independent. The remaining claims depend from claims 1, 11, and/or 21.

Amendments to the Claims

Claims 1-30 are amended by way of this reply. Specifically, claims 1, 11, and 21 are amended to clarify the invention. Claims 2-10, 12-20, and 22-30 are amended for consistency with the amendments to claims 1, 11, and 21 and to correct grammatical errors. No new subject matter is added by way of these amendments as support may be found, for example, on p. 16, ll. 11-14, p. 19, ll. 4-19, and on p. 28, ll. 8 - p. 30, ll. 3 of the Specification.

Amendments to the Specification

The Specification is amended by way of this reply to correct the missing serial numbers, filing dates, and client reference numbers in the related application section, and to remove an incomplete sentence. Applicants assert that no new subject matter is added by way of this amendment.

Rejections Under 35 U.S.C. § 102

Claims 1-5, 10-15, 20-25, and 30 stand rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent Pub. No. 2003/084165 ("Kjellberg"). To the extent that this rejection applies to the amended claims, this rejection is respectfully traversed.

The invention, as recited in the claims, is directed towards a portal server using application helper modules to display content from an application that is formatted for a specific device. *See, e.g.*, p. 16, ll. 11-14, p. 19, ll. 4-19, and on p. 28, ll. 8 - p. 30, ll. 3 of the Specification. Specifically, the device type of the device accessing the portal server is identified. *Id.* From the device type, the application helper module is identified based on the device type. *Id.* Specifically, each application helper module is associated with a different implementation of the application. *Id.* The different implementations of the application are formatted for the different device types. *Id.* In particular, the presentation of content from the application is formatted by each implementation to match the device type corresponding to the implementation. *Id.* Therefore, the application helper module that is identified is associated with the particular implementation of the application that is formatted for the device type of the device requesting content from the application. *Id.* The identified application helper module provides a link to the particular implementation of the application to the portal server. *Id.* The link is used by the portal server to display content from the application in a web page on the device. *Id.*

Turning to the rejection, in order to establish anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. *See* MPEP § 2131. Applicants assert that Kjellberg fails to disclose having multiple application helper modules that are (1) associated with

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multiple implementations of an application formatted for multiple device types, in which the application helper module is selected based on the device type and is associated with the particular implementation formatted for the device type; and (2) provides a link to the particular implementation of the application to a portal server, in which the portal server access the particular implementation of the application using an application link to provide content from the particular implementation of the application for display on a web page on a device.

Kjellberg fails to teach or suggest having multiple application helper modules that are associated with multiple implementations of an application formatted for multiple device types, in which the application helper module is selected based on the device type and is associated with the particular implementation formatted for the device type

Kjellberg is directed towards installing an application on a device in which the device may be one of multiple different device types. In order to do so, Kjellberg discloses having a single implementation of an application. *See, e.g.*, Kjellberg, paragraph [0030]. The single implementation of application is reformatted by a single deployment manager into a format suitable for the device type of the client device. *Id.* Because Kjellberg discloses having only a *single* deployment manager that is configured to reformat a *single* implementation of an application into one of multiple different formats, Kjellberg fails to teach or suggest having *multiple* application helper modules that are associated with *multiple* implementations of an application formatted for multiple device types, in which the application helper module is selected based on the device type and is associated with the particular implementation formatted for the device type as required by the claims of the present invention.

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Kjellberg fails to teach or suggest a portal server accessing the particular implementation of the application application using an application link provided by the application helper module to display content from an application on a web page on a device

Moreover, Kjellberg is silent with respect to a portal server accessing the particular implementation of the application using an application link provided by the application helper module to provide content from an application for display on a web page on a device. Specifically, Kjellberg is directed towards provisioning an application on a client device when the client device may be of different device types. *See, e.g.,* Kjellberg, paragraphs [0005], [0025], and [0047]. Provisioning requires that the application is installed locally on the client device. *Id.* Thus, content from the application is obtained from the stored application on the client device and displayed on the client device. Therefore, in Kjellberg, no content from the application is provided by a portal server in a web page as required by the claims of the present invention.

Kjellberg fails to teach or suggest all limitations of claims 1, 11, and 21

As shown above, Kjellberg fails to teach or suggest all of the limitations of claims 1, 11, and 21. Dependent claims 2-5, 10, 12-15, 20, 22-25, and 30 are allowable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Rejections Under 35 U.S.C. § 103

Claims 7-9, 17-19, and 27-29

Claims 7-9, 17-19, and 27-29 stand rejected under 35 U.S.C. § 103 as being unpatentable over Kjellberg in view of U.S. Patent Pub. No. 2003/0120784 ("Johnson"). To the extent that the rejection applies to the amended claims, this rejection is respectfully traversed.

MPEP § 2143 states that "[t]he key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit." In the Office Action mailed March 19, 2008, the Examiner, in articulating the analysis used to reject the claims under 35 U.S.C. § 103, has described the various claimed elements taught and not taught by Kjellberg. *See* Office Action mailed March 19, 2008, p. 7. Further, the Examiner has described the various claimed elements taught by Johnson, which are not taught by Kjellberg. *Id.* Using the above rationale, the Examiner "must articulate the following: (1) a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference; ..." MPEP § 2143(A).

As discussed above, Kjellberg fails to teach or suggest all of the limitations of amended independent claims 1, 11, and 21, from which claims 7-9, 17-19, and 27-29 depend. Further, Johnson fails to teach that which Kjellberg lacks as evident by the fact that Johnson is only relied on to teach an electronic mail application and electronic calendar application. *See, e.g.,* Office Action dated March 19, 2008, p. 6-7.

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In view of the above, independent claim 1 is patentable over Kjellberg and Johnson because neither Kjellberg nor Johnson teach or suggest all the limitations of independent claim 1. Independent claims 11 and 21 are patentable over Kjellberg and Johnson for at least the same reasons as independent claim 1. Further, dependent claims are patentable over Kjellberg and Johnson for at least the same reasons as the aforementioned independent claims. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 6, 16, and 26

Claims 6, 16, and 26 stand rejected under 35 U.S.C. § 103 as being unpatentable over Kjellberg in view of U.S. Patent Pub. No. 2003/0022657 ("Herschberg"). To the extent that the rejection applies to the amended claims, this rejection is respectfully traversed.

As discussed above, Kjellberg fails to teach or suggest all of the limitations of amended independent claims 1, 11, and 21, from which claims 6, 16, and 26 depend. Further, Herschberg fails to teach that which Kjellberg lacks as evident by the fact that Herschberg is only relied on to teach that the link provided by the application helper module is null if the particular application helper module restricts preference modification of the particular application. *See, e.g.,* Office Action dated March 19, 2008, p. 7-8.

In view of the above, independent claim 1 is patentable over Kjellberg and Herschberg because neither Kjellberg nor Herschberg teach or suggest all the limitations of independent claim 1. Independent claims 11 and 21 are patentable over Kjellberg and Herschberg for at least the same reasons as independent claim 1. Further, dependent claims are patentable over

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Kjellberg and Herschberg for at least the same reasons as the aforementioned independent claims. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicants believe this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226/509001; SUN030082).

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